

From: Mishell Kneeland
To: attorneykallinen@aol.com
CC: Chester, Bonnie
Date: 4/12/2010 4:54 PM
Subject: Re: Expert Witness

Mr. Kallinen,

Unfortunately, Defendant cannot agree to your request. Plaintiff's deadline under the Scheduling Order was March 1, 2010. You simply failed to respond and Judge Gilmore's granting of additional time was lucky for you, but continues to prejudice my client, as I cannot prepare our defense.

On that note, please let me know dates in June that your client is available for deposition. I would love to take his deposition sooner, but am very booked the next month and a half.

Thanks,
Mishell

Mishell B. Kneeland
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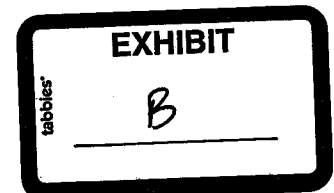
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>>> <attorneykallinen@aol.com> 4/12/2010 10:10 AM >>>

Dear Ms. Kneeland,

I hope all is well. Pursuant to the court's request plaintiff wil file a motion to extend the expert witness desgiantaion to May 15, 2010. Plaintiff will agree to extend the defendant's deadline the same time length. Is defendant opposed to extending this expert witness deadline ? Thank you.

Sincerely,
Randall L. Kallinen
Attorney and Counselor at Law
511 Broadway Street
Houston, Texas 77012
Telephone: 713/320-3785
E-mail: AttorneyKallinen@aol.com



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Sincerely,
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-----Original Message-----

From: Mishell Kneeland <mishell.kneeland@oag.state.tx.us>
To: attorneykallinen@aol.com
Cc: Bonnie Chester <bonnie.chester@oag.state.tx.us>
Sent: Fri, Jan 8, 2010 10:37 am
Subject: Re: Discovery

Mr. Kallinen,

In addition, the responses to RFAs 6-8 are improper. Please also supplement those in accordance with Federal Rule of Civil Procedure 6(a).

Thanks,
Mishell

>>> <attorneykallinen@aol.com> 1/8/2010 8:08 AM >>>

Dear Ms. Kneeland,

I hope all is well. I am preparing for trial and been very busy as well as a little under the weather. I apologize for the lateness of discovery responses, however, I am shooting for the 20th to serve them. I hope this okay and again I apologize for the lateness. Thank you.

Sincerely,
Randall L. Kallinen
Attorney and Counselor at Law
511 Broadway Street
Houston, Texas 77012

elephone: 713/320-3785

-mail: AttorneyKallinen@aol.com

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